

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

23-CR-80219-AMC

UNITED STATES OF AMERICA

v.

MICHAEL GORDON DOUGLAS,

Defendant,

DEFENDANT’S *UNOPPOSED* MOTION TO CONTINUE TRIAL DATE

COMES NOW the Defendant, Michael Gordon Douglas, by and through his undersigned attorney, and respectfully requests that this Honorable Court enter its Order continuing the trial date presently set for the two-week period commencing September 9, 2024 and continuing the Calendar Call presently scheduled for September 2, 2024, for the following reason.

The government has filed a motion to continue the trial date in this case (DE 74). The defendant has no objection to the requested continuance. In addition, if the Court grants the motion to continue, Mr. Douglas, through counsel, agrees the time from the filing of this motion until the new trial date is excludable under 18 U.S.C. §3161(h)(7)(A) because the “ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.” Specifically, the continuance will allow undersigned counsel the continued opportunity to review the voluminous discovery, to better prepare for trial, and to accommodate the schedule of counsel and the Court.

WHEREFORE, the Defendant respectfully requests that this Honorable Court enter its Order continuing and resetting the jury trial date, the Calendar Call date and extend until November 18, 2024, the time within which counsel can further prepare for trial and prepare those motions and pleadings necessary to protect and preserve the Defendant's rights.

Dated this 2nd day of August 2024

Respectfully submitted,

s/John D. Kirby
401 W. A Street, Suite 1150
San Diego, CA 92101
619-557-010
CA Bar No. 149496
619-557-0100
jkirby@johnkirbylaw.com

John R. Howes, Esq.
110 SE 6th Street
Suite 1700
Fort Lauderdale, FL 33301
Fla. Bar No. 0219193
FloridaLawyer@outlook.com
Cell: 954.328.2358

Attorneys for Michael Gordon Douglas

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Defendant's Motion to Continue Trial Date has been furnished by Electronic Delivery using CM/ECF and to Assistant United States Attorney Gregory Schiller, Esq. at Gregory.schiller@usdoj.gov and to John D. Kirby, Esq. at jkirby@johnrbylaw.com this 5th day of August, 2024.

John R. Howes, Esq.